

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.

OCT 18 2021

BY *nh*
DEPUTY CLERK

UNITED STATES OF AMERICA)

v.)

MATTHEW LYNCH)

NO. 3:21-00236

18 U.S.C. § 2252(a)(2) and (b)

18 U.S.C. § 2252(a)(4)(B) and (b)(2)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

Beginning no later than October 14, 2016, through on or about April 11, 2017, in the Middle District of Tennessee, **MATTHEW LYNCH** knowingly received any visual depiction using any means or facility of interstate or foreign commerce or that had been shipped or transported in or affecting interstate or foreign commerce, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(2) and (b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

On or about October 29, 2016, in the Middle District of Tennessee, **MATTHEW LYNCH** did knowingly possess or access with intent to view at least one matter which contains any visual depiction that had been shipped and transported in and affecting interstate and foreign commerce or was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer, the production of

such visual depiction involved the use of a prepubescent minor or a minor who had not attained 12 years of age engaging in sexually explicit conduct, and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of one or more of the offenses alleged in COUNTS ONE and TWO of this Indictment, **MATTHEW LYNCH** shall forfeit to the United States, pursuant to 18 U.S.C. § 2253:

(a) Any visual depiction described in 18 U.S.C. §§ 2251 or 2252A, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction which was produced, transported, mailed, shipped or received in violation of law;

(b) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(c) Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property including but not limited to:

Any electronic devices seized from **MATTHEW LYNCH** on April 11, 2017 including, but not limited to, the following:

- Dell Inspiron 15 laptop computer serial number 21DBXBZ
- Seagate 500GB 2.5" SATA hard drive serial number W62CMEDR
- Samsung Galaxy S6 phone
- Samsung Galaxy S7 phone

A TRUE BILL


FOREPERSON

MARY JANE STEWART
ACTING UNITED STATES ATTORNEY



MONICA R. MORRISON
ASSISTANT UNITED STATES ATTORNEY